

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CALANA SL,

Plaintiff,

08 Civ. 520 (CM) (AJP)

-against-

MADISON ADMINISTRATIVE SERVICES, INC.  
and P.M.H. INTERNATIONAL, INC. also d/b/a  
HELLE COMFORT,

Defendants.  
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**CALANA'S SUPPLEMENTAL  
RULE 26(a)(1) DISCLOSURES**

Plaintiff, Calana SL ("Calana"), pursuant to FRCP Rule 26(e)(1) and the July 23,  
2008 Order of Hon. Andrew J. Peck, hereby supplements its Rule 26(a)(1) Disclosures  
dated April 11, 2008:

**(A) Identification of Additional Individuals Likely to Have Discoverable  
Information Which Calana May Use to Support its Claims or Defenses.**

**Individual**

**Subjects of Information**

**Juan Carlos Romero Sanchez**  
President and General Director  
Calana SL.  
Avda. Hispano America,  
S/N, 03638 Salinas,  
Alicante, Spain.

Mr. Sanchez participated in and has knowledge of all  
aspects of the transactions with the defendants. Mr.  
Sanchez is also knowledgeable concerning the history of  
the relationship between Calana and the defendants.

**Jose Joaquin Chico Nieto**  
Manager of Exportation  
Madison Administrative Services, Inc.  
Calana SL.  
Avda. Hispano America,  
S/N, 03638 Salinas,  
Alicante, Spain.

General information concerning Calana's procedures for  
export of product by Calana to the United States and  
specific information concerning the transactions at issue.

(B) **Identification of Documents, Data Compilations and Tangible Things in Calana's Possession, Custody or Control Which May be Used to Support Calana's Claims or Defenses.**

Produced under separate cover are documents numbered Calana 000237 through Calana 000449. Each of these documents was previously produced. However, they are now produced assorted by each outstanding Invoice followed by its supporting transactional documentation.

**RESERVATION OF RIGHTS**

Calana reserves the right to supplement these disclosures should it become aware of additional responsive information and/or documents not disclosed herein.

Dated: New York, New York  
July 31, 2008

BALLON STOLL BADER & NADLER, PC  
*Attorneys for Plaintiff*

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